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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

JAMES DAVID WILLIAMS,

Defendant.  
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**SUPERSEDING  
INFORMATION**

S7 16 Cr. 436 (KMW)

COUNT ONE

(Wire Fraud)

The United States Attorney charges:

1. From in or about 2016, up to and including in or about 2017, in the Central District of California and elsewhere, JAMES DAVID WILLIAMS, the defendant, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, to wit, WILLIAMS participated in a scheme to fraudulently induce individuals to invest in the packaging, distribution, production, and marketing of feature-length films by, among other things, misrepresenting the amount of funding available for the film projects, and in

connection therewith and in furtherance thereof, WILLIAMS, transmitted or caused to be transmitted interstate electronic mail, telephone calls, and wire transfers of funds.

(Title 18, United States Code, Sections 1343 and 2.)

COUNT TWO

(Bank Fraud)

The United States Attorney further charges:

2. Between in or about 2006 and in or about 2007, in the Central District of California and elsewhere, JAMES DAVID WILLIAMS, the defendant, willfully and knowingly executed and attempted to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, WILLIAMS submitted a fraudulent document to a bank in connection with a scheme to deposit stolen checks.

(Title 18, United States Code, Sections 1344 and 2.)

COUNT THREE

(False Statements)

The United States Attorney further charges:

3. From in or about August 2017 through in or about October 2017, in the Southern District of New York and elsewhere, JAMES DAVID WILLIAMS, the defendant, in a matter within the jurisdiction of the executive branch of the Government of the United States, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations, to wit, WILLIAMS reported certain false information to law enforcement officials about his involvement in the fraud charged in Count One.

(Title 18, United States Code, Sections 1001 and 2.)

FIRST FORFEITURE ALLEGATION

4. As a result of committing the offense alleged in Count One of this Information, JAMES DAVID WILLIAMS, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, all property, real and personal, which constitutes and is derived from proceeds traceable to the offense alleged in Count One, including but not limited to a sum

of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

SECOND FORFEITURE ALLEGATION

5. As a result of committing the offense alleged in Count Two of this Information, JAMES DAVID WILLIAMS, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any and all property constituting or derived from, proceeds obtained directly or indirectly, as a result of the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense that the defendant personally obtained.

SUBSTITUTE ASSETS

6. If any of the above-described forfeitable property, as a result of any act or omission of JAMES DAVID WILLIAMS, the defendant:


- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982;  
Title 21, United States Code, Section 853; and  
Title 28, United States Code, Section 2461.)

  
GEOFFREY S. BERMAN  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

v.

JAMES DAVID WILLIAMS,

Defendant.

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SUPERSEDING  
INFORMATION

S7 16 Cr. 634 (KMW)

(18 U.S.C. §§ 1001, 1343, 1344, and 2.)

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GEOFFREY S. BERMAN  
United States Attorney.

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